

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

Case No. 23-cr-10079-FDS-2

SAMUEL N. MONTRONDE

**Defendant's Motion to Modify Conditions of Release:
Change of Residence**

Now comes the defendant Samuel M. Montronde in the above-entitled case and respectfully requests that this Honorable Court modify the terms of his release and change residence location. Pretrial Services assents to the request; the AUSA does not object to the move and defers to Pretrial Services.

As reason therefore, the defendant states:

1. On January 10, 2023, defendant was charged via Criminal Complaint with Wire Fraud, in violation of 18 U.S.C. § 1343.
2. On January 11, 2023, Mr. Montronde was released pending resolution of the case. The conditions of his release included maintain residence in Boston, Massachusetts (ECF No. 13).
3. On March 23, 2023, an Indictment was filed charging defendant with Conspiracy to Commit Wire Fraud, Wire Fraud, in violation of 18 U.S.C. § 1343, and Wire Fraud, in violation of 18 U.S.C. § 1343. Mr. Montronde's release conditions remained the same.
4. On September 28, 2023, this Court allowed Mr. Montronde to change

his release conditions to move to Brookline with his then-girlfriend, co-defendant Priya Bhambi, with occasional time in Brockton (ECF Nos. 72-73).

5. Mr. Montronde is now separated from Ms. Bhambi, and requests permission to move to a new residence with his sister in Brockton, Massachusetts.
6. Mr. Montronde has informed Pretrial Services of this and has provided the address.
7. Mr. Montronde seeks to amend the conditions of release to allow him to change his residence so that he may reside in Brockton.
8. Defense counsel has contacted Pretrial Services Officer Maureen Curran and Assistant U.S. Attorney Leslie Wright to advise them of this request and to obtain their position on the motion. Ms. Curran assents to the motion; AUSA Wright does not object to the move and defers to Pretrial Services.

SAMUEL N. MONTRONDE
By his attorney,

/s/ Mark W. Shea
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Dated: April 25, 2024

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 25, 2024.

/s/ Mark W. Shea
MARK W. SHEA